Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

Chopin Mill
Martco Limited Partnership
Chopin, Natchitoches Parish, Louisiana
Agency Interest Number: 32484
Activity Number: PER20050001
Draft Permit 1980-00027-V4

I. APPLICANT:

Company:
Martco Limited Partnership
1695 Hwy 490, Chopin, LA 71447

Facility:
Chopin Mill
1695 Hwy 490, Chopin, Natchitoches Parish, Louisiana
Approximate UTM coordinates are 513.01 kilometers East and 3484.98 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS:

Chopin Mill, an existing plywood manufacturing facility, began operation in 1994, under Permit No. 1980-00027-00, issued July 8, 1994. The Chopin Mill currently operates under Permit No. 1980-00027-V3, issued August 19, 2003.

III. PROPOSED PERMIT / PROJECT INFORMATION:

Proposed Permit

A permit application and Emission Inventory Questionnaire were submitted by Martco Limited Partnership on May 16, 2005, requesting a Part 70 operating permit modification. Additional information was received December 16, 2005, and January 31, 2006.

With this modification, Chopin Mill proposes to:

- Increase production from 320,000 MSF, 3/8 in/year to 500,000 MSF, 3/8 in/year
- Recalculate emissions for EQT 4, EQT 5, and EQT 11 based on an updated vendor guarantee

- Addition of four new emission sources: Veneer Dryer No. 4 Cooler Stacks, 50 Opening Press C, Thermal Oil Heating Unit C, and Dry Waste Cyclone/Baghouse System No. 2
- Increase throughput of material used in the existing glue mixing system by 32%
- Addition of Insignificant Activities

Project Description

The Chopin Mill is a manufacturer of plywood and other wood products. Logs are unloaded from trucks and stored in the log storage yard. Water is sprayed on the log piles to help prevent premature drying, condition the wood for processing, and protect the logs from decay. Logs are sent for debarking and conditioning. Afterwards they are prepared for processing. Bark is hogged and collected in a storage area for sale or transport to the fuel house where they are processed into acceptable fuel for the Thermal Oil Heating Units (EQT 9 and EQT 10). These units heat oil for the two presses, the log heating vats, and the three veneer dryers.

Debarked logs are cut into billets and placed on lathes. Lathes peel the wood to form green veneer. The billet cores are chipped, sold as round cores, or processed further and sold as a landscape product. The green veneer peeled from the billets is routed to the veneer composer area where the wood is glued together to form sheets. An on site glue mixing facility provides the glue. These plywood sheets along with other sized sheets are sent to the lay-up line where they are pressed together. The resulting plywood panels are trimmed to size and then sent to market.

Section 6 of the Permit Application, dated May 16, 2005, lists the permitted emission rate before and after the project (in tons per year) for each emission point in the permit. These changes are summarized in the Permitted Air Emissions Section.

Permitted Air Emissions

Estimated changes in permitted emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM_{10}	73.30	48.49	- 24.81
SO_2	16.10	24.67	+ 8.57
NO_X	85.16	130.57	+ 45.41
CO	156.64	240.41	+ 83.77
VOC	38.34	61.10	+ 22.76

Prevention of Significant Deterioration Applicability

The pollutants are not being increased by significant amounts by the project. Therefore, the proposed facility is not subject to the requirements of the PSD program.

This application was reviewed for compliance with the Louisiana Part 70 operating permit program and Louisiana Air Quality Regulations. NSPS and NESHAP regulations do not apply.

MACT Requirements

Chopin Mill is a minor source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

The facility complies with the ambient air standards (AAS).

Air Modeling Analysis

No dispersion modeling was performed.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the draft Part 70 permit.

Regulatory Analysis

The applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirements Section of the draft permit, or where provided, Tables 2, 3 and 4 of the draft permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the draft permit, or where provided, Tables 2, 3 and 4 of the draft permit.

IV. Permit Shields

There is no permit shield.

V. Periodic Monitoring

Compliance Assurance Monitoring

Federal regulation 40 CFR 64-Compliance Assurance Monitoring is applicable to this facility. Applicability for each pollutant requires that the unit be subject to an emission limitation or standard and must use an active control device to achieve compliance. The following emission sources with pollution control equipment have a pre-control emission rate of a pollutant over 100 tons per year and were determined to require a CAM Plan: EQT 4 – Sander No. 1 Cyclone, EQT 5 – Sawline Sander No. 2 Composer Cyclone/Baghouse, EQT 9 – Thermal Oil Heating Unit A, EQT 10 – Thermal Oil Heating Unit B, and EQT 29 – Thermal Oil Heating Unit C.

The cyclones serve to collect and reduce particulate emissions associated with the sanding and sawing of lumber and plywood products at the facility. The monitoring of visible emissions ensures that particulate emissions are being controlled. A visible emissions check is performed and the results are recorded once daily.

The Thermal Oil Heating Units serve to combust the VOC emissions produced during the drying of lumber and plywood products in the veneer dryer cooler stacks (EQT1, EQT 2, EQT 3, and EQT 26). The monitoring of the firebox temperature ensures that VOC emissions are being controlled. Instantaneous readings of the temperature are recorded continuously.

VI. Applicability and Exemptions of Selected Subject Items

ID No:	Requirement	Notes
Entire Facility AI # 3443	Chemical Accident Prevention and Minimization of Consequences [LAC 33:III.Chapter 59]	DOES NOT APPLY. Facility does not store or process any referenced list substances greater than the threshold amounts.
EQT 8-9 Veneer Dryers	Control of Emissions of Organic Compounds – Waste Gas Disposal [LAC 33:III.2115]	EXEMPT. Vent gas stream with a concentration of VOCs less than 0.44 psia true partial pressure (30,000 ppm) per LAC 33:III.2115.H.d.

VI. Applicability and Exemptions of Selected Subject Items		
ID No:	Requirement	Notes
EQT 6	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60.110b]	DOES NOT APPLY. Storage tank is less than 40 cubic meters. [40 CFR 60.110b(a)]
EQT 9 EQT 10 EQT 29	Emission Standards for Sulfur Dioxide [LAC 33:III.1503]	EXEMPT. Units emit less than 250 tons of SO_2 per year. [LAC 33:III.1503.C]

VII. Streamlined Requirements			
Unit or Plant Site	**Programs Being Streamlined**	**Stream Applicability**	**Overall Most Stringent Program**
Chopin Mill	None	-	-

VIII. Glossary

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

Carbon Monoxide (CO) – A colorless, odorless gas which is an oxide of carbon.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Hydrogen Sulfide - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

New Source Review (NSR) - A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to

ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10}- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO_2) – An oxide of sulphur.

Title V permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.